

STATE OF TENNESSEE

Office of the Attorney General



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PAUL G. SUMMERS
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ANDY D. BENNETT
CHIEF DEPUTY ATTORNEY GENERAL

LUCY HONEY HAYNES
ASSOCIATE CHIEF DEPUTY
ATTORNEY GENERAL

Reply to:
Consumer Advocate and Protection Division
Attorney General's Office
P.O. Box 20207
Nashville, TN 37202

MICHAEL E. MOORE
SOLICITOR GENERAL

425 FIFTH AVENUE NORTH
NASHVILLE, TN 37243-0485

TELEPHONE (615) 741-3491
FACSIMILE (615) 741-2009

August 21, 2001

Guy Hicks, Esq.
BellSouth Telecommunications
333 Commerce Street
Suite 2101
Nashville, TN 37201-3300

Re: Docket No. 97-00309
BellSouth Telecommunications, Inc.'s Entry into Long
Distance (Interlata) Service in Tennessee Pursuant to
Section 271 of the Telecommunications Act of 1996

Dear Guy:

To assist in our investigation of BellSouth Telecommunications, Inc.'s entry into Long distance (Interlata) Service in Tennessee Pursuant to Section 271 of the Telecommunications Act of 1996, please furnish two copies of the information itemized in the attachment to this letter.

Please comply with the following instructions for compiling the requested data:

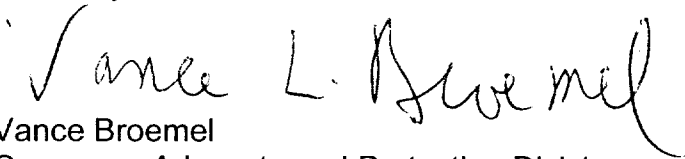
- (1) Each of the response should begin by restating the item requested.
- (2) If several sheets are required to answer an item, each sheet should be appropriately labeled and indexed, for example, Item 1(a), Sheet 1 of 4.
- (3) Please respond fully to the request even if the data has been partially supplied in prior filings or dockets. It is requested that the information be submitted to this office at P. O. Box 20207, Nashville, TN 37202-0207.

If you need clarification of any attached request, please contact Mr. Vance Broemel at (615) 741-8733 before furnishing the response. If any requests duplicate

Guy Hicks, Esq.
August 21, 2001
Page Two

requests by other parties, please feel free to direct us to your response to that party instead of answering in full our request.

Sincerely,


Vance Broemel
Consumer Advocate and Protection Division

48025

**BellSouth Telecommunications, Inc.'s Entry into
Long Distance (Interlata) Service in Tennessee Pursuant to
Section 271 of the Telecommunications Act of 1996
Docket No. 97-00309
First Data Request**

1. In a spreadsheet provide BellSouth's annual profit from Tennessee operations, in millions of dollars, for each year from 1996 through 2001.
2. Provide the annual revenues received from Tennessee operations for each year from 1996 through 2001.
3. In a spreadsheet, provide a list of services currently offered by BellSouth in Tennessee and the current price for each service. If any service now has a price that is lower than it was in 1998, 1999 or 2000, indicate what the old price was, the year it applied to the service, and provide the ratio of the old price to the current price.
4. In the spreadsheet listing services now offered in Tennessee, provide the percentage of annual revenues accounted for by the service during the year 2000; for example, if a certain service provided \$50 million in revenue and the company's Tennessee revenues were \$500 million, then the percentage is 10%.
5. For each year from 1996 through 2001, provide the number of local loops BellSouth owned in Tennessee.
6. In Tennessee for each year from 1996 through 2001, provide the number of BellSouth-owned local loops capable of supporting Digital Subscriber Line (DSL) Service.
7. In Tennessee for each year from 1996 through 2001, provide the number of DSL subscribers that BellSouth served.
8. For each year from 1996 through 2001 provide the number of BellSouth-owned local loops in Tennessee, where a competitor delivered DSL service over BellSouth's loop.
9. For each year from 1996 through 2001, provide the number of BellSouth-owned local loops in Tennessee, where a competitor delivered "Plain Old Telephone Service" over BellSouth's loop.
10. Provide an estimate of the annual revenues BellSouth believes it has lost to competitors in Tennessee, for each year from 1996 through 2001. Regarding the data provided, indicate what services accounted for the lost

revenues and who the competitors are.

11. For services currently provided by BellSouth in Tennessee, indicate which services, if any, will have their prices reduced when BellSouth offers interLata service in Tennessee.
12. Has competition in Tennessee caused BellSouth to delay equipment purchases or discharge personnel? If the answer is 'yes' provide the dollar value of the equipment, the dollar value of the compensation that was avoided by discharging the personnel.
13. Has competition in Tennessee caused BellSouth to make equipment purchases or add personnel? If the answer is 'yes' provide the dollar value of the equipment, the dollar value of the compensation for adding the personnel.
14. Has competition affected the price of BellSouth's common stock? If the answer is 'yes', provide any study or report prepared by the company or its consultants, to support your answer.

CERTIFICATE OF SERVICE

I hereby certify that on August 21, 2001, a copy of the foregoing document was served on the parties of record, via hand delivery, facsimile, overnight or US Mail, addressed as follows:

<input type="checkbox"/> Hand	H. LaDon Baltimore, Esq.
<input checked="" type="checkbox"/> Mail	Farrar & Bates
<input type="checkbox"/> Facsimile	211 Seventh Avenue., N. #320
<input type="checkbox"/> Overnight	Nashville, TN 37219-1823
<input type="checkbox"/> Hand	Charles B. Welch, Esq.
<input checked="" type="checkbox"/> Mail	Farris, Mathews, et al.
<input type="checkbox"/> Facsimile	205 Capitol Blvd., #303
<input type="checkbox"/> Overnight	Nashville, TN 37219
<input type="checkbox"/> Hand	Henry Walker, Esq.
<input checked="" type="checkbox"/> Mail	Boult, Cummings, et. al.
<input type="checkbox"/> Facsimile	P. O. Box 198062
<input type="checkbox"/> Overnight	Nashville, TN 37219-8062
<input type="checkbox"/> Hand	Dulaney O'Roark, Esq.
<input checked="" type="checkbox"/> Mail	MCI WorldCom, Inc.
<input type="checkbox"/> Facsimile	Six Concourse Parkway, #3200
<input type="checkbox"/> Overnight	Atlanta, GA 30328
<input type="checkbox"/> Hand	James P. Lamoureux
<input checked="" type="checkbox"/> Mail	AT&T
<input type="checkbox"/> Facsimile	1200 Peachtree St., NE., #4068
<input type="checkbox"/> Overnight	Atlanta, GA 30367
<input checked="" type="checkbox"/> Hand	Donald L. Scholes
<input type="checkbox"/> Mail	Branstetter, Kilgore, et. al.
<input type="checkbox"/> Facsimile	227 Second Avenue., N.
<input type="checkbox"/> Overnight	Nashville, TN 37219
<input checked="" type="checkbox"/> Hand	Enrico C. Soriano
<input checked="" type="checkbox"/> Mail	Kelley, Drye & Warren
<input type="checkbox"/> Facsimile	1200 19 th St., NW., #500
<input type="checkbox"/> Overnight	Washington, DC 20036
<input checked="" type="checkbox"/> Hand	James Wright, Esq.
<input checked="" type="checkbox"/> Mail	United Telephone - Southeast
<input type="checkbox"/> Facsimile	14111 Capitol Blvd.
<input type="checkbox"/> Overnight	Wake Forest, NC 27587

☐ Hand
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☐ Facsimile
☐ Overnight

Guilford Thornton, Esq.
Stokes & Bartholomew
424 Church Street
Nashville, TN 37219

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

D. Billye Sanders, Esq.
Waller, Lansden, Dortch & Davis
511 Union Street, #2100
Nashville, TN 37219-1750

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Andrew O. Isar, Esq.
ASCENT
3220 Udddenberg Lane, NW
Gig Harbor, WA 98335

☐ Hand
☒ Mail
☐ Facsimile
☐ Overnight

Jon E. Hastings, Esq.
Boult, Cummings, et. al.
P. O. Box 198062
Nashville, TN 37219-8062

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Vance L. Hoemel
August 21, 2001